

**From:** [Dave Anderson](#)  
**To:** [Brenda Cook/R6/USEPA/US@EPA](#); [Kristine Lloyd](#)  
**Subject:** RE: Wilcox  
**Date:** 11/07/2012 12:25 PM

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I will be available.

**David Anderson**

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**From:** [Cook.Brenda@epamail.epa.gov](mailto:Cook.Brenda@epamail.epa.gov) [mailto:[Cook.Brenda@epamail.epa.gov](mailto:Cook.Brenda@epamail.epa.gov)]  
**Sent:** Wednesday, November 07, 2012 11:54 AM  
**To:** Dave Anderson; Kristine Lloyd  
**Subject:** Fw: Wilcox

Will you both be available for the call?

Brenda Nixon Cook  
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214-665-7436

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[www.marrow.org](http://www.marrow.org)

----- Forwarded by Brenda Cook/R6/USEPA/US on 11/07/2012 11:53 AM -----

From: "alicia shultz" <[aliciashultz@princetowncable.com](mailto:aliciashultz@princetowncable.com)>  
To: "William A Chantry" <[wchantry@csc.com](mailto:wchantry@csc.com)>, Robert Myers/DC/USEPA/US@EPA, Brenda Cook/R6/USEPA/US@EPA  
Cc: <[crobinson20@csc.com](mailto:crobinson20@csc.com)>  
Date: 11/07/2012 11:50 AM  
Subject: Wilcox

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In preparation of the quality assurance review call scheduled for 11/8/2012 at 12:30 pm eastern time (Via teleconference at 866-299-3188 code 2146657436) for the Wilcox Oil Company site, CSC has prepared the following discussion points:

**Reference 27**

**Not Detected**



9566117

Reference 27 states:

"The ODEQ laboratory corrects sample concentrations for the sample weight, sample volume, dilution and percent solids, however they do not correct reporting limits to provide sample quantitation limits (SQLs) and do not include corrected reporting limits (SQLs) for analytes which were detected." [emphasis added]

This would seem to imply that, when an analyte is not detected, the lab did present an SQL (the value next to the "<" symbol in the HRS documentation record). However, in these instances a different calculated value is provided in the SQL column of the HRS documentation record tables, (e.g., for sample LWSS-9 arsenic, "<10" was listed in the laboratory form Reference 10 page 191) and is shown in the "Conc." column in the HRS documentation record Table 7. But, this value appears to have been further adjusted in Reference 27 and presented as 5.03 in the SQL column of the HRS documentation record Table 7.

### **SQL Calculations**

Also, in Reference 27, for the metals analytical results, it appears that the "Lab QL" value (presumably the non-sample specific QL) is adjusted for percent solids and final digest volume, but not for dilution factor, (e.g., for sample 485645, on page 30 of Reference 27, it seems that the SQL should be 50.3 if the dilution factor of 10 is taken into account).

In addition, in Reference 27, for the metals analytical results, it appears that SQLs were calculated for one sample per page and applied to the rest of the samples on that page, (e.g., on page 37 of Reference 27, the SQL calculated for sample 485648 seems to be applied to samples 485653 and 485654, even though these other two samples have different percent solids values than 485648.)

Page 2 of Reference 27, provides a formula that was used to calculate SQLs for each analyte in the soil, sediment and waste samples. The formula states to use the "Reported lab RL for aqueous (ug/L)," however it appears that Lab QL's were provided for each soil, sediment and waste sample and in units of mg/kg. Therefore, it does not appear that the correct formula has been provided in Reference 27. Also, it is not clear whether the reported lab RL is equivalent to the Lab QL. In addition, it appears that different units are reported in Reference 27, for example, page 33 lists samples 485648, 485653 and 485654, and samples 485653 and 485654 were reported in ug/L and sample 485648 was reported as ug/kg, and it appears that the units should be mg/kg in Reference 27 and the HRS documentation record.

### **Other**

In the HRS documentation record results tables, when a result is not-detected, it is unclear what the value presented next to the "<" sign is.

### **Revised Documentation Record**

Source 2, which was included in the first draft HRS documentation record for the Wilcox Oil Company dated May 2011, was removed from the second draft HRS documentation record dated October 2012. Soil samples used to characterize this source had concentrations of lead up to 50,000 milligrams per kilogram and semivolatile organic compounds (SVOC) up to 11,000 µg/kg. CSC's first quality assurance review indicated that Source 2 may be two separate sources, one source with metals contamination and the other with SVOC contamination because some of the soil samples contained high metals and non-detects of SVOCs and some soil samples contained high SVOCs and relatively low concentrations of metals. Also, the sampling locations were large distances apart.

Sincerely,

ALICIA SHULTZ

Senior Environmental Scientist

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Science, Engineering and Mission Support

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